UNITED STATES DISTRICT COURT NORTHERN DISTRICT OF GEORGIA ATLANTA DIVISION

IN RE EQUIFAX INC. SECURITIES LITIGATION

Consolidated Case No. 1:17-cy-03463-TWT

LEAD PLAINTIFF'S UNOPPOSED MOTION FOR AN ORDER PRELIMINARILY APPROVING CLASS ACTION SETTLEMENT AND AUTHORIZING DISSEMINATION OF NOTICE OF SETTLEMENT

Lead Plaintiff Union Asset Management Holding AG ("Lead Plaintiff"), hereby moves this Court, under Rule 23(e)(1) of the Federal Rules of Civil Procedure, for entry of an order: (i) preliminarily approving the proposed Settlement; (ii) approving the form and manner of giving notice of the proposed Settlement to Class Members; and (iii) scheduling a hearing to consider final approval of the Settlement and approval of the Plan of Allocation and Lead Counsel's motion for attorneys' fees and Litigation Expenses. In support of this motion, Lead Plaintiff submits the Memorandum of Law in Support of Lead Plaintiff's Unopposed Motion for an Order Preliminarily Approving Class Action Settlement and Authorizing Dissemination of Notice of Settlement, attached hereto as Exhibit 1, and the Stipulation and Agreement of Settlement dated February 12,

2020 (the "Stipulation"), attached hereto as Exhibit 2.¹ The Parties' agreed-upon [Proposed] Order Preliminarily Approving Settlement and Authorizing Dissemination of Notice of Settlement is attached hereto as Exhibit 3. Pursuant to the terms of the Stipulation, this motion is unopposed by Defendants.

Dated: February 13, 2020 Respectfully submitted,

/s/ James A. Harrod

James A. Harrod
(admitted *pro hac vice*)
Abe Alexander
(admitted *pro hac vice*)

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Counsel for Lead Plaintiff Union Asset Management Holding AG and Lead Counsel for the Class

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¹ All capitalized terms used herein that are not otherwise defined herein have the meanings given to them in the Stipulation.

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Local Counsel for Lead Plaintiff
Union Asset Management Holding AG

RULE 7.1(D) CERTIFICATION

I hereby certify that this document has been prepared with 14 point Times

New Roman, one of the font and point selections approved by the Court in Local

Rule 5.1(C).

/s/ James A. Harrod
James A. Harrod

CERTIFICATE OF SERVICE

I hereby certify that on February 13, 2020, I caused a true and correct copy of

the foregoing MOTION FOR AN ORDER PRELIMINARILY APPROVING

CLASS ACTION SETTLEMENT AND AUTHORIZING DISSEMINATION OF

NOTICE OF SETTLEMENT, as well as the accompanying MEMORANDUM OF

LAW, STIPULATION AND AGREEMENT OF SETTLEMENT, and PROPOSED

PRELIMINARY APPROVAL ORDER, to be filed with the Clerk of Court using

the CM/ECF system, which will automatically send email notification of such filing

to the attorneys of record in this Action.

/s/ James A. Harrod

James A. Harrod